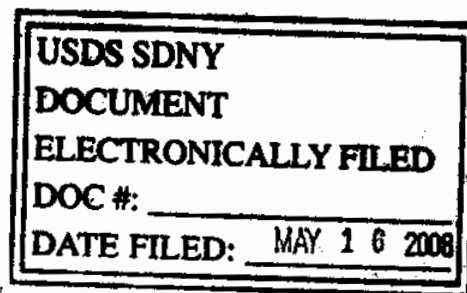


EDWARD W. ARMSTRONG, P.C.
Attorney at Law
233 Broadway
Suite 707
New York, New York 10279
(212) 964-3544



May 12, 2008

BY FAX 212-805-6312

Honorable Paul A. Crotty, United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Rein v. Cab East, LLC, et al.
08 CV 2899 (PAC)

Your Honor:

This office represents the plaintiff in the above-referenced action. This letter is submitted for two (2) reasons: to request a conference with the Court to resolve a discovery dispute, and to request an extension of a deadline in the Scheduling Order.

Firstly, the defendants have not complied with several of the plaintiff's discovery demands. This action arises from an incident in which the plaintiff, a pedestrian, was struck by the defendants' motor vehicle. In response to the plaintiff's Request for Admissions, dated April 14, 2008, the defendants "denied knowledge and information" sufficient to state whether defendant Cab East LLC owned, was the registered owner of, or the title owner of, the subject vehicle. Also, though they were required by the Scheduling Order to provide "all documentation relative to insurance coverage for the subject vehicle, including affidavit as to excess insurance," the defendants have failed to provide that documentation or affidavit. And, though defense counsel advised this office that the driver of the subject vehicle had rented that vehicle from an entity which is not named as a defendant, counsel has failed to identify that entity.

Accordingly, the plaintiff respectfully requests that the Court schedule a conference to address the above-mentioned discovery. On May 12, 2008 this office conferred by telephone with defense counsel and was told that the outstanding discovery would be provided shortly.

Secondly, the plaintiff respectfully requests an extension of the current May 14, 2008 deadline for motions to amend or join additional parties. The plaintiff is unable to join additional parties or even determine whether such a motion is necessary - until ownership of the subject vehicle is established and defense counsel provides the identity, and ownership interest, of the

MEMO ENDORSED

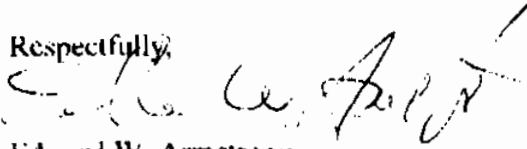
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entity referred to earlier. The plaintiff respectfully requests that the extended motion deadline be determined at the above-requested discovery conference. Defense counsel has consented to the deadline extension and no previous requests for adjournments or extensions have been requested.


The Court's time and attention to this matter is greatly appreciated.

Respectfully,


Edward W. Armstrong

cc: Downing & Peck, P.C.
by fax 212-514-9241

SO ORDERED: MAY 16 2008


HON. PAULA A. CROTTY
UNITED STATES DISTRICT JUDGE